

Attachment B

Comments and Responses

Comments and Responses

The Draft Environmental Assessment (EA) was distributed to the public on January 22, 2004. Comments were scheduled to be received for 30 days until February 23, 2004.

Approximately 75 copies of the Draft EA were distributed to Federal, State, and local agencies, native American tribes, irrigation districts, and interested members of organizations and the general public. A total of 6 comment letters were received during the public review. Reclamation's responses to the significant comments and these documents are included in this attachment B (Comments and Responses).

The comment letters are presented in the order shown in the distribution list and in the table below. The responses precede the comment documents. The first page of each comment document is identified in the table below.

Some comments are repeated in several of the letters received. A summary of the comments and responses follow the table.

Commenters are from the state of Oregon unless otherwise indicated.

Written Comments

The following table provides the list of those commenting in distribution list order, with the page number of the comment document.

		Letter (page)
01	Confederated Tribes of the Umatilla Indian Reservation, Pendleton	B-5
02	Bureau of Indian Affairs, Portland	B-9
03	Morrow County Court, Heppner	B-13
04	West Extension Irrigation District, Irrigon	B-14
05	Westland Irrigation District, Hermiston	B-16
06	Strebin Farms, Inc. Irrigon	B-17

Summary of Significant Comments and Reclamation Responses

The significant review comments are summarized below along with Reclamation's responses. Some changes have been made in the text, where appropriate, in response to the comments.

Comment:

What effect does the irrigation of these additional lands have on the West Extension Irrigation District?

Response:

The RiverWare model identified an effect on the West Extension Irrigation District (West Extension) because West Extension's irrigation water is, in part, based on return flows from upstream irrigators. Based on the hydrologic modeling done for the EA, the preferred alternative would reduce flows at Threemile Falls Dam during the irrigation season. This would reduce the amount of water available for diversion at Threemile Falls Dam by West Extension in July, August, and the first half of September by 450 acre-feet. It should be noted that the impacts estimated by the model are smaller than the errors in the actual streamflow measurements used as input of the model. Because Westland will address this concern by obligating 500 acre-feet of McKay water as part of the proposed action for use by West Extension any potential impact to West Extension is alleviated. The 500 acre-feet accounts for conveyance losses from McKay to Threemile Falls Dam. Allocation and distribution of this water will comply with Oregon State Water laws.

Comment:

The proposed mitigation/enhancement allows for water to stay in McKay Reservoir and be available for fisheries. Why isn't this water available to West Extension Irrigation District?

Response:

Based on RiverWare model results, 895 acre-feet of water is being provided as mitigation to instream flow impacts. Westland has also committed to the CTUIR that they will provide an additional 605 acre-feet of water from their McKay allocation as a fishery enhancement measure. Both quantities of water would be released from McKay Reservoir at the request of the fishery managers (CTUIR and Oregon Department of Fish and Wildlife) and would be protected from diversion to the mouth of the Umatilla River.

Comment:

With projected lower flows in September above Westland's diversion dam, the amount of suitable habitat area would be reduced from both a temperature and wetted-area perspective.

Response:

Irrigation releases under the Full Boundary Adjustment alternative would cease in the last week of September, potentially reducing flows above Westland's diversion dam compared to the No Action alternative, under which releases for irrigation continue until early October. Storage releases from McKay for instream flow purposes, however, are already underway by the last week of September. Consequently, releases for irrigation and releases for instream flows overlap by several days which ensures that the cessation of irrigation releases doesn't result in changes to suitable habitat. In 2003, when this overlap occurred, releases from McKay Reservoir rose in the period of overlap from about 80- 130 cfs to around 200 cfs and then fell to around 150 cfs when irrigation releases ceased. The instream flow releases are made in September to augment flows all the way to the mouth of the river.

Comment:

Since fish augmentation water must be released during this period to maintain rearing habitat, this water is unavailable to fish when they need it during passage periods, which causes lower flows during spring and/or fall fish migration.

Response:

The fish augmentation water, to maintain rearing habitat, would not need to be released until after McKay Reservoir releases for Westland end. In the past Westland has foregone use of up to about 6,300 acre-feet of McKay storage water as mitigation under the Temporary Water Service Contracts (TWSC). Because of that mitigation commitment, Westland has not had enough water to irrigate past the middle of September. The fish augmentation water has been used by fisheries managers after Westland had stopped irrigating but before McKay releases were needed to augment flows for fish migration. With Westland providing 1,500 acre-feet of water for instream flow augmentation, 895 acre-feet as mitigation for the boundary adjustment and, as an additional commitment to the CTUIR, 605 acre-feet as a fishery enhancement measure, instead of 6,300 acre-feet, they can continue to divert water into the latter part of September. Consequently, storage releases to augment flows for fish migration will already be underway before Westland stops irrigating, so releases to maintain habitat conditions above Westland's diversion dam wouldn't be needed.

Comment:

Page 8 – Provides that “[c]ategory III are lands that lie outside Westland’s boundaries and consist of 8,855.5 acres of which 5,759 would be irrigated in any given year.” The Draft EA, however, does not provide any discussion of how the BOR intends to monitor this and similar limitations on water use provided in the document, how will the agency assure that these limitations are carried out?

Response:

Since 2001, Reclamation has implemented an effort to identify unauthorized use by implementing a district review process. In implementing this review process, Reclamation has committed to periodic on-site reviews to determine whether the annual use of water is in accordance with existing contract terms. During these reviews, Reclamation staff will travel to the irrigation district office to make an onsite review of a number of items related to the use of project water, including the acres of lands served, water delivery records and water-master records. If it is found that the district is not complying with the contract terms, then Reclamation will advise the district of the actions required to bring them into compliance.



CONFEDERATED TRIBES
of the
Umatilla Indian Reservation

P.O. Box 638
PENDLETON, OREGON 97801
Area code 541 Phone 276-3165 FAX 276-3095

February 23, 2004

Ronald Eggers, Area Manager
U.S. Bureau of Reclamation Pacific Northwest Region
Lower Columbia Area Office
825 NE Multnomah St., Suite 1110
Portland, OR 98907

RE: WID Draft EA – Comments

Dear Ron:

Thank you for the opportunity to comment on the Bureau of Reclamation's (Reclamation) Draft Environmental Assessment for the Westland Irrigation District Boundary Adjustment dated December 2001 (DEA). The Tribal Water Commission for the Confederated Tribes of the Umatilla Reservation (the Commission) believes a significant amount of progress has been made over the last decade or so that Westland's boundary adjustment proposal has been on the table. This is primarily a result of the 2003 MOA between the Westland and the Tribes as well as several joint efforts the two entities have engaged in to benefit the salmon fishery in the Umatilla Basin and to maintain the farming economy.

In addition to the comments provided below, the Commission intends to abide by its commitment to Westland Irrigation District provided under the Memorandum of Agreement dated April 25, 2003. One of the Commission's principal concerns is the further reduction in water available for fish, which decreased from about 6500 ac-ft (1993 MOA) to about 1900 ac-ft in Westland's 2003 Temporary Water Service Contract in 2003 to 895 ac-ft as provided in the DEA. This is a setback for fish restoration in the Umatilla Basin, and a solution to the problem may need to be found outside the NEPA process.

The Commission has the following specific comments:

I. Appendix A

The Commission is encouraged by the analysis of the Pre-conservation Scenario provided in Appendix A-1. This is in keeping with Reclamation's commitment, made in

fall of 2000, to draft a separate no action alternative that identifies the specific impacts of WID's conservation activities and to conduct an historic overview to look at development of both the Umatilla Project and the Umatilla Basin Project and their environmental effects.

At the same time, Reclamation's preferred action will result in a decrease of 1,000 ac-ft (below the 2003 mitigation requirement) of water available for fish augmentation flows on an annual basis. In addition to those listed by Reclamation in the DEA on Page 47, lower water releases for irrigation in September have two potential impacts on fish: 1) at lower flow levels the amount of suitable habitat area is reduced from both a temperature and wetted-area perspective – this is not captured adequately in the text as the DEA uses the generic term to “a short reach of the Umatilla River” without any reference to actual size of the area, and 2) since fish augmentation water must be released during this period to maintain rearing habitat, this water is unavailable to fish when they need it during passage periods, which causes lower flows during spring and/or fall fish migration. These impacts negatively affect fish and are inconsistent with the Umatilla Basin Project Act of 1988. As a result, the Commission shall consult with Reclamation and meet with Westland to discuss measures to increase flows in the river to meet fundamental fish needs.

II. Miscellaneous

- a) The frontpiece figure: This figure shows the County Line Irrigation District in with WID. Figures 2 and 3 also include CLWID but not in Figure 1.
- b) Page 8 – Provides that “[c]ategory III lands are lands that lie outside Westland's boundaries, and consist of 8,855.5 acres of which 5,759 would be irrigated in any given year.” The DEA, however, does not provide any discussion of how the BOR intends to monitor this and similar limitations on water use provided in the document. How will the agency insure that these limitations are carried out?
- c) Page 30 – Mitigation: the DEA should explain why impacts occurring in the River above WID's diversion in June, September, and October do not need to be mitigated. Refer to Tables 10, 13, 15, and 20, under normal conditions, impacts during the migration periods sum to 2,889 ac-ft. The increased streamflow in July and August does not compensate for the reduced flow during the spring and fall salmonid migration periods.
- d) Page 40 – Salmon: Here are more accurate numbers and years; CHF 85 - 6,028 (1985-2002), CHS 13 - 5,246 (1988-2003), and Coho 29 - 22,872 (1987-2002).
- e) Page 41 – Streamflow: The statement in the 2nd paragraph that the Umatilla River downstream from McKay Creek is only used seasonally for migration and over-wintering is contradictory to the discussion and citations on pages 43 and 50 (Germond 2000) that

identifies this reach as summer rearing habitat for steelhead. This use should also be included in Table 24. Also, the spring chinook adult migration season of use is incorrect – it should be April – July.

f) Page 44 – Salmonid Juvenile Rearing: 1) the discussion of summer rearing is related to coho spawning areas but back in the Salmonid Spawning section there is no description of coho spawning distribution and magnitude in relationship to the affected project area below McKay Creek and 2) this discussion is specific to the late summer period when WID discontinues McKay irrigation releases.

g) Page 46 – Lamprey: In the last sentence, they can't go behind the fish ladder. They can pass through diffusers inside the ladder without passing in front of the viewing window.

h) Page 50 – MCR Steelhead: Potentially, spawning does occur in lower McKay Creek.

i) Page 51 – Bull Trout: There have also been a few adults (5) captured at Three Mile Dam in May and June.

j) Page 52 - MCR Steelhead and Bull Trout: Steelhead "migrants" may be present..." – This statement is incorrect as stated, should probably use a different term than migrants here (juveniles?). Also, see comments above regarding lower flows in September.

k) Page 54 – Recreation (Affected Environment and Consequences): No mention at all of McKay Reservoir and associated recreational usage and potential impacts.

l) Page 65 – Exchange Program: Last paragraph, water exchange with WEID ends July 1. WEID doesn't "potentially" divert the entire flow they DO divert the entire flow.

m) For the reader, it would be easier to view a hydrograph of the wet, average, and dry years with a table of the flow differences for the different reaches. As it is with just tables, the reader is not able to easily examine the trends in flow differences between conditions and location.

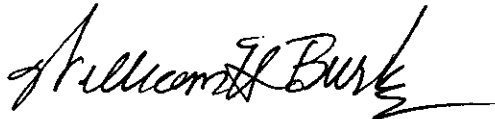
This concludes the Commission's comments on the Draft Environmental Assessment for the proposed boundary adjustment for Westland Irrigation District. We assume that once this EA is finalized, it will go through the NOAA consultation process under Section 7.

The Commission intends to uphold the commitments in CTUIR's 2003 MOA with Westland. We may want to consult with Reclamation in mid-March, prior to the developments and issuance of a FONSI, to discuss how to resolve our concerns about the impacts of the reduction of water available for fish. If you have any questions regarding

Ronald Eggers
February 23, 2004
p. 4

these comments please contact the Tribal Water Resources Program Staff at (541) 966-2426. I look forward to continuing to work with you on the WID boundary expansion process.

Sincerely,

A handwritten signature in black ink, appearing to read "William Burke", with a stylized flourish at the end.

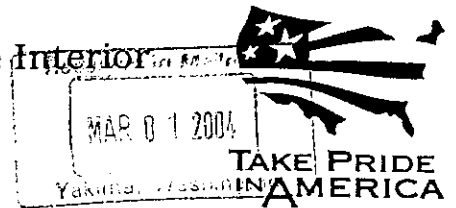
William Burke, Chairman
Tribal Water Commission

Cc: Tribal Water Commission
Antone Minthorn/BOT
Michael Farrow/DNR
Aaron Skirvin/WRP
Harold Shepherd/WRP
Kate Ely/WRP
Gary James/Fisheries
Brian Zimmerman/Fisheries
Dan Hester/Tribal Attorney
Bob Hamilton/BOR
Dave Kaumhiemer/BOR
Mike Wick/WID
Michael Tehan/NOAA Fisheries



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Northwest Regional Office
911 N.E. 11th Avenue
Portland, Oregon 97232-4169



MEMORANDUM

FEB 26 2004

TO: Dave Kaumheimer, Bureau of Reclamation

FROM: Northwest Regional Director

SUBJECT: Review of Proposed Boundary Adjustment for the Westland Irrigation District, Umatilla Project, Oregon, Umatilla and Morrow Counties - Draft Environmental Assessment.

This office has reviewed the Draft Environmental Assessment and the attached comments prepared by the Bureau of Indian Affairs contractor - Natural Resource Consulting Engineers. Please accept these comments as the Bureau of Indian Affairs response to the request for review and comment.

Please contact Ms. Mary T. Manydeeds at 503-872-2886 if you have any questions regarding this memorandum.

Attachments



MEMORANDUM

Date: February 19, 2004

To: Mary Manydeeds, Bureau of Indian Affairs, Northwest Regional Office

From: Marijan Babic, Natural Resources Consulting Engineers, Inc.

Re: Comments on the Draft Environmental Assessment, *Proposed Boundary Adjustment for the Westland Irrigation District, Umatilla Project, Oregon*

Natural Resources Consulting Engineers, Inc. (NRCE) has reviewed the January 2004 Draft Environmental Assessment, *Proposed Boundary Adjustment for the Westland Irrigation District, Umatilla Project, Oregon* (DEA), which was prepared by the U.S. Bureau of Reclamation (BOR). NRCE is the prime contractor to the Bureau of Indian Affairs (BIA), Northwest Regional Office (NWRO), regarding the National Environmental Policy Act (NEPA) proceedings concerning the proposed boundary adjustment for the Westland Irrigation District (WID).

Since May 2002, NRCE has participated in the work of the Umatilla Hydrologic Model Development Team in an oversight role for the BIA-NWRO. NRCE has performed review and assisted in the development of the calibration version of the *RiverWare* hydrologic model, which was used by the BOR as the basis for the hydrologic modeling and analysis presented in the DEA.

NRCE has previously reviewed and prepared comments on the August 2003 Administrative DEA (ADEA). Most of NRCE's comments on the ADEA have been addressed in the DEA. The modeling and analysis that were performed for the DEA represent improvements over those that have been performed for the ADEA. Following are NRCE's comments on the technical issues in the DEA.

Formulation of Alternatives

The fundamental assumption in the DEA is that the WID would use all water that is presently used on the out-of-boundary lands to extend irrigation season on the in-boundary lands in the event that the proposed boundary adjustment is not approved. The DEA presents an assumed cropping pattern and the corresponding crop water requirements. However, the DEA does not compare these requirements to the actual historical water deliveries to demonstrate that these historical deliveries were insufficient and that extending the irrigation season would be appropriate. The DEA does not demonstrate that the assumed use of all water within the WID boundaries under the No Action Alternative (NAA) would not exceed the crop water requirements. The DEA also does not explain how the irrigation season would be extended in practice to exactly compensate for discontinuance of the current project water use on out-of-boundary lands under the NAA.

Mitigation

The DEA provides for mitigation of 895 ac-ft for impacts due to differences in the return flows below the Dillon Diversion. However, the DIA does not specify the manner in which the mitigation water would be applied. The application of the mitigation water should match the timing of the impacts. Furthermore, 895 ac-ft represents the average annual impact for years 1994-2002 (Table 11). The impacts in different years are different and in some years the impacts will be greater than 895 ac-ft. For example, Table 17 shows that the average impacts in wet years are 948 ac-ft. The impacts in the worst year would be even higher.

Furthermore, there is no mitigation specified for impacts above Westland Diversion. These impacts are approximately 13 cfs in September and approximately 8 cfs in October, relative to baseline flows of the order of 150 cfs. On page 47, the DEA argues that fish releases from McKay Reservoir in September and October would provide adequate conditions for rearing under all alternatives. However, the DEA does not present background information on the operational policy concerning these releases and it is not clear that these releases would guarantee adequate conditions. It is furthermore not clear that sufficient water would be available in McKay Reservoir at all times to provide adequate releases. The impacts shown in Table 10 can be interpreted as differences in the releases under the NAA relative to the Full Boundary Adjustment Alternative (FBAA). Having to release less water under the NAA would result in more water in McKay Reservoir to be used later. Hence, the FBAA results in impacts on the amount of storage water available for fish releases, and these impacts should be mitigated. The sum of the average impacts for September and October is 1,266 ac-ft, and the impacts in the worst year would be higher.

Period for Analysis

The results presented in the ADEA are based on the period 1994-2002 (9 years), while the full modeling period includes 1947-2002 (46 years). Although the model is being run for 46 years, it appears that the period 1947-1993 is not used for anything. Given the structure of the model, it is probably more appropriate to report the results based on the more recent period during which the Umatilla Basin Project facilities were in place. However, nine years is generally not sufficiently long to extract accurate averages. Furthermore, the results for wet, average, and dry years are based on samples of three years each, which leads to an even greater uncertainty in the averages.

This problem is caused by developing a model based on the direct input of the historical gage flow and diversion data. If this data exhibits significant changes over time due to changes in system configuration, the resulting model is only appropriate for the period during which the system configuration was the same as the configuration of the system under consideration. This problem is generally avoided by developing a model which is not based on the historical gage flow and diversion data but on the historical natural flows and operating rules appropriate for the scenario under consideration. Such a model would be demand-driven, would allocate natural flows according to live flow water rights, would include McKay Reservoir and possibly various storage accounts in it, and would determine McKay Reservoir releases based on the appropriate operating rules. Such a model would be able to simulate the system over the entire period of record and would produce significantly more accurate averages of results of interest. Short of developing, validating, and applying such a model, the BOR should acknowledge the uncertainty in the average results obtained for the nine-year period.

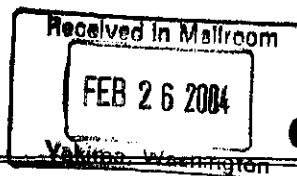
Discrepancies with Respect to the Calibration Model

The acreages for the Full Boundary Adjustment Alternative (as presented in Table 7), particularly for the Westland Out-of-Boundary, are very different from the acreages at the last time step in the calibration model. In particular, the acreage for the Westland Out-of-Boundary Flood-storage for 1991 (and all other years) in the calibration model is zero, whereas the Full Boundary Adjustment Alternative has 7,241.3 acres. It appears that the calibration model may not have properly reflected the actual acreages and water use in the district.

NRCE has previously raised this comment on the ADEA. The BOR has investigated the effect of changing acreages in the calibration model but concluded that calibrated parameters are not sensitive to these changes (personal communication with J. Roache, BOR, on February 17, 2004). Based on this analysis it can be assumed that the parameters used in the model were valid for the applications presented in the DEA.

Pre-Conservation Scenario

The impacts of the pre-conservation scenario are being determined by comparison with the NAA, which again assumes that all conserved water would be used within the WID boundaries. As discussed above, this fundamental assumption for the NAA has not been justified. It would be more appropriate to determine the impacts of the pre-conservation scenario relative to the case in which the conserved water would not have been used inside or outside of the WID at all.



COUNTY COURT

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TERRY K. TALLMAN, Judge
email: ttallman@co.morrow.or.us
Boardman, Oregon
JOHN E. WENHOLZ, Commissioner
email: jwenholz@co.morrow.or.us
Irrigon, Oregon
RAY GRACE, Commissioner
email: rgrace@co.morrow.or.us
Heppner, Oregon

February 26, 2004

Dave Kaumheimer, UCA-1600
Bureau of Reclamation
Upper Columbia River Area Office
1917 Marsh Road
Yakima, WA 98901

TRUE COPY
OF ORIGINAL

Re: Proposed Boundary Adjustment, Westland Irrigation District
Umatilla Project, Oregon, Draft Environmental Assessment

Dear Mr. Kaumheimer:

Morrow County is concerned that the Boundary Adjustment for the Westland Irrigation District will have economic impact upon its patrons in the West Extension Irrigation District. This issue is related to the continuing decrease in return flows in the Umatilla River and West Extension's consequent increasing reliance upon its Columbia River pumps. As you are aware, when district pumps water, the cost increases.

Morrow County asks that you address these two issues in your Environmental Assessment:

- 1) What effect does the irrigation of these additional lands have on the West Extension Irrigation District diversion? The time frame studied should be prior to the original expansion of the boundaries (pre-1983), in order to get an accurate assessment.
- 2) The mitigation proposed in the boundary adjustment seems to allow the water to stay in the McKay Reservoir and be available for fisheries. Why isn't the mitigation water available to West Extension?

The Board of Commissioners remains concerned about water issues in the County, and request that you revise your document to thoroughly address the concerns that we have. Thank you.

Sincerely,

Terry K. Tallman
Morrow County Judge

West Extension Irrigation District

P. O. Box 100 Irrigon, Oregon 97844
541-922-3814 541-922-9775 (fax)

February 26, 2004

Mr. Dave Kaumheimer, UCA-1600
Bureau of Reclamation
Upper Columbia Area Office
1917 Marsh Road
Yakima, WA 98901

Re: Draft Environmental Assessment, Proposed Boundary Adjustment
Westland Irrigation District, Umatilla Project, Oregon

Dear Dave:

First of all, thank you for extending the comment period three days to accommodate our needs.

West Extension Irrigation District is the West End of the Umatilla Basin project. The project is heavily reliant upon return flows. These return flows originate from the water use practices of upland irrigation districts, including Westland.

The West Extension Irrigation District has three areas of concern relative to the Draft Environmental Assessment.

1) The Draft Environmental Assessment does not completely or accurately address all of the hydrological impacts and potential consequences of the alternatives. Most significantly, impacts to downstream irrigators and irrigation districts as well as likely responses to those impacts on the environment are completely ignored. What are the residual effects of the action? It is evident that a more comprehensive hydrological study is needed that takes into account all the cumulative effects, which include likely district impacts and responses to the alternative. The results of such a study may well affect the conclusions that have been made in this draft document. Until these aspects of impact are analyzed, the conclusions of the Draft Environmental Assessment cannot generate confidence.

2) The federal project water that serves most of the West Extension Irrigation District is made up of return flows of which a significant amount is from McKay Reservoir. The mitigation proposed in the Draft Environmental Assessment does not mitigate for the reduction of these return flows to the West Extension Irrigation District diversion or for likely responses to such reduction. If any of the alternatives has a reasonable and likely probability of forcing fundamental changes in district operation and water use, which in turn could have potential impacts on the environment, and if such action causes other residual effects, then the Draft Environmental Assessment must come to grips with these facts and assess the significance of such impacts. There are clear economic and social impacts, as well, which are interrelated to natural or physical environmental impacts. The Draft Environmental Assessment completely ignores all these issues.

3) The baseline used for the Draft Environmental Assessment should logically be established before conservation era, that is, before 1983, when Westland's water spreading (the actions whose impacts are being assessed) actually began. It should likewise take into account the impacts of the action and mitigation needs that have arisen from that time, including impact to West Extension's diversion.

The West Extension Irrigation District requests the opportunity to review the modeling and offer comments. Please let us know when that can be done.

We request that the Final Environmental Assessment evaluate rather than ignore the impacts noted above, and that West Extension's issues be considered in any final decision. We are available for further discussion on these issues.

Sincerely,

A handwritten signature in cursive script that reads "Beverly J. Bridgewater". The signature is written in dark ink and is positioned above the typed name and title.

Beverly J. Bridgewater
Secretary/Manager

WESTLAND IRRIGATION DISTRICT

Phone (541) 667-2030
Fax (541) 667-2031

P.O. Box 944
Hermiston, OR 97838

February 20, 2004

Mr. Dave Kaunheimer
Upper Columbia Area Office
U.S. Bureau of Reclamation
1917 Marsh Road
Yakima, WA 98901

Dear Dave,

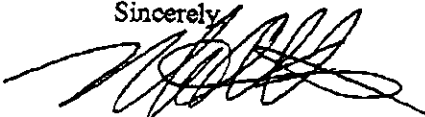
Thank you for the opportunity to comment on the draft environmental assessment (EA) describing the impacts associated with the action of adjusting Westland Irrigation District's (Westland) federally recognized boundaries. This has been a long and challenging process, and Westland appreciates the efforts of you and other Bureau of Reclamation officials in reaching this point.

Westland suggests the following edits to the draft EA:

1. The model-derived mitigation amount of 895 acre-feet is based on a full fill of McKay Reservoir. Consistent with past operations, it should be noted that if McKay Reservoir does not fill, the mitigation amount for that year would be reduced by the percentage the reservoir lacked in reaching one-hundred percent fill capacity. E.g., if the reservoir filled to 95 %, the mitigation amount would be reduced by 5 %.
2. The maps showing the category I & II lands seem to show some of these lands as inside the recognized federal boundary. This may be due to the category I & II lands being identified on the map in full forty-acre blocks rather than by quarter-quarter.
3. On page 79, the draft EA states the anticipated mitigation would come from Westland's contracted McKay storage. To be consistent with the rest of the document, the last sentence on the page should read, "Westland would use McKay storage water to fulfill the mitigation requirements."

Please contact me with questions you may have regarding these comments.

Sincerely,



Mike Wick
District Manager

Strebin Farms, Inc.
P. O. Box 724, Irrigon, OR 97844
541-922-2521

February 26, 2004

Dave Kaumheimer, UCA-1600
Bureau of Reclamation
Upper Columbia River Area Office
1917 Marsh Road
Yakima, WA 98901

Re: Comments – Westland Irrigation District - Proposed Boundary Adjustment
Draft Environmental Assessment

Dear Mr. Kaumheimer:

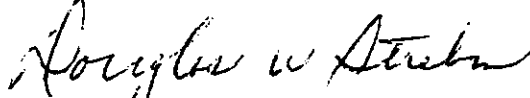
I represent Strebin Farms, which has landholdings in the West Extension Irrigation District (WEID) and receives water through the WEID. I have been irrigating in WEID for a number of years as well as serving on the Board of Directors for the past six years.

I have reviewed the Draft Environmental Assessment and find that the modeling and subsequent analysis presented in the document does not take into account the effect of the proposed action on the West Extension diversion. I am concerned that by ignoring this fact, and providing proper mitigation, the cost of water in the WEID will continue to escalate as they rely more and more on pumped water.

I also noted that on Page 67 of the document, you stated that WEID is requesting 6000 acres of land, which are currently irrigated. That is not the correct statement. The WEID is requesting 3000 acres of land that have been irrigated since 1968 and an additional 3000 acres for future irrigation. The rest of the statement concerning WEID's proposed adjustment on page 67 seems correct.

Thank you for this opportunity to provide comments.

Sincerely,



Douglas W. Strebin
Principal

